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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

In re:

Genesis Global Holdco, LLC, *et al.*¹

Debtors.

Chapter 11

Case No.: 23-10063 (SHL)

Jointly Administered

Genesis Global Capital, LLC,

Plaintiff,

v.

Digital Currency Group, Inc.

Defendant.

Adv. Pro. No. 23-01168 (SHL)

**NOTICE OF RECEIPT OF PAYMENT FROM DIGITAL
CURRENCY GROUP, INC. AND DCG INTERNATIONAL INVESTMENTS LTD.
IN CONNECTION WITH OBLIGATIONS SUBJECT TO TURNOVER ACTIONS**

PLEASE TAKE NOTICE that, on January 19, 2023 (the “Petition Date”), Genesis Global Holdco, LLC and its affiliates Genesis Global Capital, LLC (“GGC”) and Genesis

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's tax identification number (or equivalent identifier), are: Genesis Global Holdco, LLC (8219); Genesis Global Capital, LLC (8564); and Genesis Asia Pacific Pte. Ltd. (2164R). For the purpose of these Chapter 11 Cases, the service address for the Debtors is 250 Park Avenue South, 5th Floor, New York, NY 10003.

Asia Pacific Pte. Ltd., as debtors and debtors-in-possession in the above-captioned cases (collectively, the “Debtors” and the cases, the “Chapter 11 Cases”), each filed a voluntary petition for relief under chapter 11 of title 11 of the United States Bankruptcy Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”) with the United States Bankruptcy Court for the Southern District of New York (the “Court”).

PLEASE TAKE FURTHER NOTICE that on September 6, 2023, GGC initiated adversary proceedings by filing the *Complaint*, ECF No. 1, Adv. Pro. 23-01168 (SHL) (the “DCG Complaint”) against Digital Currency Group, Inc. (“DCG”) and the *Complaint*, ECF No. 1, Adv. Pro. 23-01169 (SHL) (the “DCGI Complaint,” and together with the DCG Complaint, the “Complaints”) against DCG International Investments Ltd. (“DCGI”) seeking turnover of certain property pursuant to 11 U.S.C. § 542(b).

PLEASE TAKE FURTHER NOTICE that, on September 12, 2023, GGC filed the *Notice of Voluntary Stay of Prosecution of Complaints Against Digital Currency Group, Inc. and DCG International Investments Ltd.*, ECF No. 4, agreeing to a voluntary stay of prosecution of the Complaints, subject to the terms and conditions of the *Partial Repayment Agreement* dated as of September 12, 2023 between GGC, DCG and DCGI attached thereto as Exhibit A² without prejudice to its ability to continue to pursue the Complaints.

PLEASE TAKE FURTHER NOTICE that, on September 13, 2023, GGC received, pursuant to the terms of the Partial Repayment Agreement, the following payments or transfers from the applicable DCG Party: (i) a forbearance fee in the amount of \$2,315,937.92, (ii) a payment of \$58,500,000 on account of outstanding principal in respect of the DCG Loans, (iii) a transfer of 638.54616543 BTC on account of outstanding principal in respect of the June 22 Loan and (iv) a transfer of 70.43849944 BTC on account of Late Fees accrued under the June 22 Loan as of August 31, 2023.³

PLEASE TAKE FURTHER NOTICE that, on October 3, 2023, GGC received, prior to the applicable Payment Date under the Partial Repayment Agreement, the following payments or transfers from the applicable DCG Party: (i) two payments totaling \$58,500,000 on account of outstanding principal in respect of the DCG Loans and (ii) a transfer of 599.91212208 BTC on account of outstanding principal in respect of the June 22 Loan.

PLEASE TAKE FURTHER NOTICE that, on October 20, 2023, GGC received, prior to the applicable Payment Date under the Partial Repayment Agreement, the following payments or transfers from the applicable DCG Party: (i) a payment in the amount of \$58,000,000 on account of outstanding principal in respect of the DCG Loans and (ii) a transfer of 574.22242453 BTC on account of outstanding principal in respect of the June 22 Loan.

² Capitalized terms used but not defined herein shall have the meaning ascribed to them in the Partial Repayment Agreement.

³ On September 13, 2021, GGC filed a *Notice of Receipt of Payment by Digital Currency Group, Inc. and DCG International Investments Ltd. in Connection with Obligations Subject to Turnover Actions*, ECF No. 5, that included a typographical error in clause (iii) stating that the amount of BTC received on such date was 639.54616543 BTC. As noted above, the correct amount that should have been referenced in clause (iii) was 638.54616543 BTC.

Dated: October 20, 2023
New York, New York

/s/ Sean A. O'Neal
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